

Exhibit L

Mark Thomas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF
MARK THOMAS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF NASSAU)

MARK THOMAS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 8 Alaska Avenue, North Massapequa, New York 11758.

2. I am currently 64 years old, having been born on September 24, 1957.

3. I am the son of George M. Thomas, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic cancer of unknown primary origin on October 4, 2016. It was medically determined that this cancer was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My relationship with my father was like any father-son relationship. He helped me learn about life. My father taught me everything, and we were very close. We spent a lot of time on the water, on different boats. My father had a background in boating. He used to be a commercial fishing boat captain. I was the mate on the boat, and I helped him do all the work that a fisherman would do. I learned all the ropes and spent time with my father. We would go

fishing, crabbing, and clamming. We did lots of local activities at the beach club and went sleigh riding in the winter. We always had a dog. I live close by to my parents as an adult, so we would spend a lot of time together. We had a happy family.

6. My father worked for the NYC Department of Sanitation. He was involved with the World Trade Center clean-up efforts after 9/11 at the Fresh Kills Staten Island landfill. He ran controller boats to catch the debris that fell off the barges in Staten Island. He started working at the landfill shortly after 9/11 and continued to work there for about a year or so. It wasn't a pleasant job by any means, and my father kept the details mostly to himself. We didn't ask, and he didn't tell. We knew it was unsanitary, but now we know how dangerous it truly was.

7. Prior to 9/11, my father was a very healthy person. He would walk the dogs a few times a day and go out on the boat. He was from a different generation; he didn't complain about his health. After 9/11, he began to have respiratory issues. He had a lot of trouble breathing. He couldn't walk our dogs as much because it became hard for him to walk. He couldn't boat, and his friends would have to take him out on their boats. He was often fatigued. He suffered from asthma and gastro-esophageal reflux disease.

8. My father developed cancer in his eye, nasal cavity, and eventually his internal organs. He had surgeries for the eye melanoma and nasal passage cancer, to remove both of the tumors. He was later diagnosed with thyroid cancer, which then started to spread. For a long time, he was functioning normally, but when the cancer spread to his kidneys, he soon started to deteriorate. One day, he was walking the dog and he was so weak that he fell over. His leg began swelling due to a blood clot, so we took him to the hospital. My father was in the hospital for two weeks, where his kidneys were failing. My father was in good spirits, and we were hoping they could get him on dialysis. The last time I visited him at the hospital, I noticed his catheter. I saw there was blood in there. That was the first time I thought, "Hey, this could be serious. His life could be at risk." The next thing I know, I got a phone call that the blood clot had spread to his brain. The doctors tried to revive him to no avail.

9. It was pretty devastating. It was traumatic, because no one expected him to die. I was shocked and drained for quite a while. It was also extremely hard watching my mother suffer, because she is an emotional person in the first place. She was overwhelmed by my

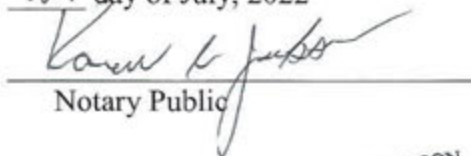
father's sudden death. After my father died, it fell on me to do pretty much everything. My mom relied on my dad physically, spiritually, and emotionally. I had to manage my mother's financial situation, put things together for her will, and maintain her home, all of which was usually done by my father. I assisted my mother with buying a new car. My mother also has IBS and anxiety, which worsened after my father died. I've had to take my mother to the hospital several times because she had panic attacks. Even small things, like troubleshooting the computer, my mother can't do alone.

10. Our family would always look forward to fishing, going to the beach, and going on the boat. We had to sell off my father's boat and his car, and I had to handle all the paperwork. That part of our lives disappeared. I also did the paperwork for my father's 9/11 claims.

11. It's been six years since my father's passing. I am now a grandfather myself, and I know my father would have been a wonderful great-grandfather to my grandchildren. He missed out on all that, he loved to play with the kids. He was a family man—family was important to him. He's missed out on family milestones. My father loved life. He was the centerpiece of the whole family. Everybody enjoyed being around him, and he'd always joke around. That's all gone. He took care of his family and shared everything with everybody. He was a good man.


MARK THOMAS

Sworn to before me this
12th day of July, 2022


Notary Public

KAREN C. JACKSON
Notary Public, State of New York
No. 01JA4988666
Qualified in Nassau County
Commission Expires Nov. 12, 2023

Andre Cox

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
ANDRE COX**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NORTH CAROLINA)

COUNTY OF WAKE)
: SS.:

ANDRE COX, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3656 Kapalua Way, Raleigh, North Carolina 27610.

2. I am currently 58 years old, having been born on February 28, 1964.

3. I am the husband of Vikki Allyn Turner-Cox, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My wife died from breast cancer on March 28, 2014, at the age of 49. It was medically determined that her illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My wife Vikki and I met at college in 1982. We started out as friends during freshman year but were romantically involved as seniors. We married five years later. Vikki was soft-spoken, but lively. She looked very prim and proper, but she had an adventurous side

and loved driving fast with the windows down and the wind in her hair. We shared laughter. We wanted the same things out of life. We would plan our future together—how many kids we wanted, where we would live and retire, where our kids would live—lots of plans for our lives together. We had plans that unfortunately got cut short.

6. Vikki worked for Verizon on September 11, 2001, as an essential services provider. Her office was on Pearl Street, right by the twin towers. I was driving upstate and heard the news on the radio. She was on the train to work when I phoned her. I told her the World Trade Center was on fire. When she repeated it, I could hear the other train passengers start to react, before the call dropped. I couldn't reach her after that. I headed straight back home to Bergen County. I could see the smoke and fire coming out of the towers while I was driving. Thankfully, she made it home safely that day. Verizon told her to return to work the next day, September 12, 2001, to help rebuild their communication tower that was damaged in the attack. Verizon gave an authorized letter that deemed her an essential worker. I drove her to work every day that week, because mass transit was closed. We were getting escorted by the National Guard. She was continually exposed to the air, which the government was telling everyone was safe. Of course, it wasn't safe. Vikki continued to work downtown for Verizon, until she became ill.

7. In September 2012, my wife noticed a lump on her breast. We got the results of her biopsy about a month later. The biopsy revealed she had Stage-2 breast cancer. Initially, the doctors didn't think she needed to remove the breast. She decided to start on chemotherapy treatments. At first, the tumor shrank, but not for long. The tumor started getting larger. The doctors were concerned by its growth pattern. It was an aggressive form of cancer.

8. After weighing the options, Vikki decided to have a double mastectomy on May 22, 2013. She chose to remove both breasts as a prophylactic measure against a recurrence. The surgery was deemed successful. There was no sign of additional cancer, and she continued being monitored and had reconstructive breast surgery once she had healed. By the summer, a scan revealed that the cancer was everywhere- in her back, her liver. It had spread everywhere. On her doctors' advice, we went to Dana Farber Cancer Institute in Boston in October 2013. But even the doctors there said it was untreatable. The doctors told us to resume our normal lives! Vikki asked them, kind of jokingly, "so you're telling me I have six months to live?" The

doctors responded, "We don't like to give anyone a timeline. We prefer to tell people to go ahead and live your life." We were stunned. The ride back to New Jersey was about four hours. I drove with my left hand the entire time because she was clutching my right hand so tightly. She didn't speak. I just don't know what she was going through. We both were hurting, but I don't know what was going through her mind because it wasn't happening to me. I felt helpless. I've known her for so long and I just couldn't help her. She didn't even last six months.

9. Our two youngest children were still in school and lived with us, a high school senior and a fourth grader. Vikki tried to hide the severity of her illness and her pain from them. When the cancer eventually spread to Vikki's skin, her skin was raw, almost as if she had been burned. When I would put the ointment on her, I felt like I was torturing my wife. It was so painful for her to be touched even lightly. None of the ointments offered any relief. Our daughter, who was nine-years old, wanted to hold on to Vikki all the time. Vikki was trying her best to accommodate our daughter despite the pain. I found myself policing my daughter not to touch her mother.

10. I'm trying to make this all seem normal. I'm trying to make sure that the kids were going on with their lives. I told them, "Play your sports. Go to prom." My daughter was turning 10, which was a big deal, and we had been promising her a party. Vikki didn't live to see it, but I made sure she had that party. Otherwise, she'd always remember that she didn't have a birthday party because mommy died.

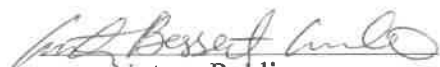
11. Financially, we relied on being a 2-income family. Vikki's pay got reduced when she had to go on disability. We were getting by paying the bills and the mortgage. I had a solid job, so we were lucky the rest of the family survived without the added trauma of losing our home.

12. The last three months of my wife's life, Vikki declined drastically. She couldn't walk, she looked like a shell of herself. The hardest part was when she couldn't communicate, anymore. She would talk to me, but it was like she was hallucinating. Nothing made sense. But the look in her eyes was so intense. Whatever she was trying to tell me was urgent to her. Later, she'd forget all about it, as if it never happened. During her illness, the feeling of helplessness was devastating. When I did what was medically necessary, I caused her pain. I had no idea what

she was going through because she couldn't communicate it. The last month of her life was a rapid decline. She lost all ability to speak, walk and eat. It broke my heart to see her that way. I was so focused on trying to find a way to cure her, that I never had a chance to just sit with her to say goodbye or tell her how much the kids and I would miss her. I was watching my wife disappear but trying to maintain a normal life for my kids. None of this was normal.


ANDRE COX

Sworn to before me this
19th day of July, 2022


Notary Public

My commission expires Aug. 14th 2023



Armond Rhian Cox

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
ARMOND RHIAN COX**

Plaintiffs,

20-CV-00354 (GBD)(SN)

 γ

ISLAMIC REPUBLIC OF IRAN.

Defendant.

STATE OF NEW JERSEY)
) : SS.:
COUNTY OF BERGEN)

ARMOND RHIAN COX, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 661 Grant Terrace, Teaneck, New Jersey 07666.
2. I am currently 26 years old, having been born on May 4, 1996.
3. I am the son of Vikki Allyn Turner-Cox, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother died from breast cancer on March 28, 2014, at the age of 49. It was medically determined that her illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. I saw myself as my mom's little "bodyguard and protector." Anything she needed, as long as I could physically do it, I would help her. My mom and I had similar personalities. Verbally, we might have been quiet, but we loved anything that got our adrenaline pumping. We didn't need to have deep conversations, we just enjoyed each other's company. One of the things I remember growing up is my mom reading me books at bedtime. Instead of reading books like

Dr. Seuss, she read Harry Potter to me, at a really young age, and I loved it. Looking back, I remember other kids weren't interested in stuff like that, with complicated storylines and characters. I credit my mom for my love of reading from then until now. I continue to be an avid reader. I'll owe that to her the rest of my life.

6. On September 11, 2001, I was in kindergarten. That time is a bit muddled because I was so young, around 5 years old. From what I remember, I was at school on that day when they announced our parents were coming to take us all home, early. To a kid, school being canceled was something you cheered. But, when my dad came to pick up my brother and me, we heard on the news over and over that the World Trade Center towers had been hit. I knew my mom worked there. I was worried and confused trying to make sense of where my mom was. My dad assured me that mom was on her way back home. She left early that day, but she was back at work the very next day. For at least that first week, we'd all drive my mom to work. As soon as bus and train service resumed, mom was back to her regular schedule. She worked down by ground zero the rest of her time at Verizon, until she got sick.

7. I found out about my mom's illness just before I started football camp—around the summer of 2012. My parents told me. They explained that she was starting chemotherapy treatments, which might make her weak, but that would help her get better. It turned out to be a guise—the surgery, the treatments, everything she had to suffer through, that was supposed to make her better. As we all know, that's not the case. I always had hope that she would come back from behind. I felt completely blind-sided. Mom would say that she was fine, but all the kids saw she was getting weaker. We tried to behave better, less rough housing, not picking on my little sister. We never explicitly discussed anything, us kids or my parents. We were all pretending everything was status quo.

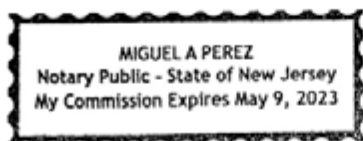
8. I've been deeply affected by her illness and death. It's done a real number on me. I struggle with depression. I've been in and out of therapy. The feeling of helplessness, that really impacted me from the beginning and does to this day. In high-school, I was a two-sport athlete. I was physically gifted that way. Here I am with this physical potential to do things. Now, I had to sit there and twiddle my thumbs, unable to do anything except sit and watch my

mom get weaker. I never want to feel useless like that again. It's a feeling that will never go away.


ARMOND RHIAN COX

Sworn to before me this
11th day of July, 2022


Notary Public



Leigh N. Cox

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
LEIGH N. COX**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF PENNSYLVANIA)

:SS.:
COUNTY OF MONROE)

LEIGH N. COX, being duly sworn, deposes and says:

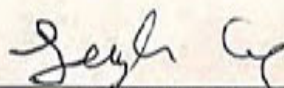
1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3156 Carobeth Drive, Tobyhanna, Pennsylvania, 18466.
2. I am currently 31 years old, having been born on December 7, 1990.
3. I am the son of Vikki Allyn Turner-Cox, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother died from breast cancer on March 28, 2014, at the age of 49. It was medically determined that her illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. I was closer to my mother than to anyone else. We liked to do gardening together. She always encouraged me to continue school. Growing up, before high school, the family took a lot of trips together. We had a time-share in Florida and would go down multiple times a year.
6. On September 11, 2001, I was in the fifth grade. I remember they sent us home from school. I knew my mom worked downtown on Pearl Street for Verizon. I knew her office

was very close to the World Trade Towers. She worked for Verizon until she got sick and couldn't work anymore.

7. My mom told me she had breast cancer around 2012, shortly after her diagnosis. She tried to protect us and keep our lives as normal as possible and didn't share all of the specific details. She didn't want our dad to tell us everything about the severity of her illness either. I remember she was going back and forth into Manhattan, a lot. It happened very fast. Looking back, it's all a blur. I remember there were lots of doctors' appointments, and I would accompany her on many of those trips.

8. Emotionally, it didn't hit me at first. Being the oldest son, I was more worried about my siblings. My younger brother was still in high-school, and my sister was only 8-years old. I feel like she's been able to handle it better than my brother and me.

9. Had my mother lived, I wonder if I would have accomplished more. She was always pushing me to do more. I didn't finish college, which was something she wanted me to do. Mom was the one who lit a fire underneath me. I was a procrastinator. I wish I had known more about her illness and what was happening with her. I keep her picture close to me, always, and I miss her every day, but I try not to think about her illness and death.



LEIGH N. COX

Sworn to before me this
28 day of July, 2022


Notary Public

Commonwealth of Pennsylvania - Notary Seal
Gladys M. Roberts, Notary Public
Monroe County
My commission expires December 7, 2025
Commission number 1268123
Member, Pennsylvania Association of Notaries

Gwendolyn Audrey Lee Turner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF
GWENDOLYN AUDREY LEE
TURNER**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF GEORGIA)

: SS.:

COUNTY OF FULTON)

GWENDOLYN AUDREY LEE TURNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6010 Renaissance Parkway, Apartment 1108, Fairburn, Georgia 30213.

2. I am currently 85 years old, having been born on January 7, 1937.

3. I am the mother of Vikki Allyn Turner-Cox, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My daughter died from breast cancer on March 28, 2014, at the age of 49. It was medically determined that her illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My daughter and I were good friends. She was a voracious reader. I credit myself for making that a priority when my children were young. If she was interested in something, she was all-in. She used to go to her kids sporting events to support them. She always went, but she usually would read a book during the games. She didn't care about sports, but she enjoyed being at the games and reading, which I still don't understand. She'd go to every wrestling match or

football game. Vikki wouldn't miss them, even during her chemotherapy, which I took her to every day, five times a week. What surprised me the most about the treatment, was how much time it took to get started. Each day, they needed to draw her bloodwork and run tests to determine the specific type of chemotherapy she'd receive. Every time, it was like she was a new patient checking-in.

6. I had retired before Vikki got diagnosed, and I was living with Vikki and Andre, because she'd just given birth to her youngest child, Jayden. After she was diagnosed, I spent the days with her at treatment and then Andre and the kids took over at night. I used to stay busy taking classes and doing activities for seniors, but, that all kind of faded away. It was so difficult to watch my daughter decline. Things started to happen to her before anyone would realize what was wrong. I found out she couldn't move when one day I was helping her into the car. I couldn't pull, she couldn't push, and we both wound up on the ground. After that, I had to get her into a wheelchair. It was so strange. From one day to the next, anything could just change on a dime. The cancer mutated so quickly and efficiently. It was eating her from the inside out. The doctors had no explanation. They didn't know what it was, where it was coming from or why it was spreading so quickly.

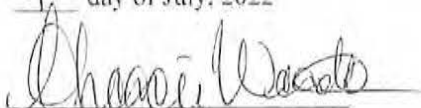
7. Since her death, I still don't feel I've had the time to mourn her. She was my daughter, but also my friend. My son lived far away, and we were close, but it was still long distance. Vikki was always right there for me.

8. No mother should ever have to see her daughter suffer and pass away. She was so young and had so much more life to live.

Shacari Woodard
NOTARY PUBLIC
Henry County, GEORGIA
My Commission Expires 07/28/2025


GWENDOLYN AUDREY LEE TURNER

Sworn to before me this
7th day of July, 2022


Notary Public

Kenneth Herman Turner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

Plaintiffs,

**AFFIDAVIT OF
KENNETH HERMAN TURNER**

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF BERGEN)

KENNETH HERMAN TURNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 276 Shepard Avenue, Apartment #2, Englewood, New Jersey 07631.

2. I am currently 75 years old, having been born on September 25, 1946.

3. I am the brother of Vikki Allyn Turner-Cox, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister died from breast cancer on March 28, 2014, at the age of 57. It was medically determined that her illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My sister Vikki and I weren't raised together, but we had a good one-on-one relationship. She lived in Teaneck, New Jersey, and I was in Englewood, New Jersey, which we'd consider "down the corner" from each other. We talked and saw each other on family occasions. Vikki was fun. She liked to goof around a lot before she got diagnosed.

6. I knew Vikki worked for Verizon on September 11, 2001, and that she continued to work there. I assumed she was working in an office.


7. My sister Nancey told be about Vikki's illness. I didn't know Vikki was out in the field. When I found out that her illness was caused by her working in outside on September 11, I took it very hard. Why would they send somebody down there to work so quickly? When I realized that from Nancy, it bothered me for a long time.

8. After I found out about my sister's diagnosis, I would go spend time with her at her home. We'd sit and talk. We didn't get into the details of her diagnosis or treatment because it's not what Vikki wanted to talk about. Nancy would update me on Vikki's actual condition. When Vikki took a turn for the worse, I didn't visit as often, but I was always informed about her. She was sick and getting worse and still wanted to take care of her family and kids. It felt selfish of me to take up her time and exhaust her energy when she had so much else going on. Her daughter, the youngest child, was especially close to Vikki. She wanted to be with her mom all the time. She had her hands full. I felt whatever time Vikki had left, she should be with her kids. I do wish Vikki got to see what a beautiful young woman her daughter became.

9. Vikki was so young when she got diagnosed. I still choke up when I think about that. It was painful. I didn't really comprehend how bad her condition was, until her family told me. It was difficult to imagine her being that sick, that she was dying.


KENNETH HERMAN TURNER

Sworn to before me this
9th day of July, 2022


Notary Public

MATHEWS PATHICKAL
Commision #2416512
Notary Public, State of New Jersey
My Commision Expires
January 24, 2027

Mark Owens Turner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZANNE ANDERSON, et al.,

AFFIDAVIT OF
MARK OWENS TURNER

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF GEORGIA)

: SS.:

COUNTY OF FULTON)

MARK OWENS TURNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6010 Renaissance Parkway, Apartment 1108, Fairburn, Georgia 30213.
2. I am currently 60 years old, having been born on March 6, 1962.
3. I am the brother of Vikki Allyn Turner-Cox, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My sister died from breast cancer on March 28, 2014, at the age of ~~51~~ ⁴⁹ *MOT*. It was medically determined that her illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. I was a typically over-protective older brother to Vikki. I did a pretty good job at keeping the boys away. Vikki was reserved, but she was a firecracker. She was not afraid of anything, and she stood-up to me plenty of times, especially when it came to girlfriends. We had each other's back.
6. On the morning of September 11, 2001, I was watching the morning news and preparing to go to work, like any other day. I grew up in New Jersey, but at the time was living

in Indiana, closer to my wife's family. Vikki and I still had a strong relationship. I saw the plane hit the first tower, and I knew Vikki worked near there. I immediately called her. She was on the bus heading to work. I told her that a plane had just hit one of the World Trade Center Towers. When she repeated it, I could hear a commotion from the other passengers. I told her to get off the bus and do not go into the city. I kept insisting she tell the bus driver to stop and let her out, but she went to work. I remember spending the entire day at work searching the internet trying to find out what was going on.

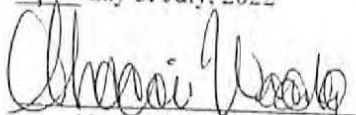
7. I learned about Vikki's illness from my mom. As soon as she told me, I assumed it was because of her having worked at Ground Zero. My mom kept me in the loop about Vikki's treatments and progress. Vikki and I talked. At first, she was getting better. Within less than a month, she took a turn for the worse. Vikki explained that the cancer was mutating. Whatever treatment they tried, the cancer kept changing. I knew it didn't sound good, but I chose to be optimistic and believe my sister would get better, even if it was against the odds. My mom was with Vikki and her husband Andre. She called me one day and said, "Mark, I think it's time you come see Vikki now." I'd been asking my family from the beginning if I should go back home to help in any way. The answer was always, "No. We're ok."

8. By the time I returned to New Jersey, in March, Vikki was already in the hospital. Seeing her broke my heart. She was so frail and weak. I'd never seen my sister like that. I didn't want to cry in front of my sister, but I knew she was dying. I'd go out in the hallway and just cry. Growing up, I was always her protector, and there was nothing I could do for her now. She passed away days later. I miss my sister, immensely.

Shacari Woodard
NOTARY PUBLIC
Henry County, GEORGIA
My Commission Expires 07/28/2025


MARK OWENS TURNER

Sworn to before me this
14th day of July, 2022


Notary Public

Nancy Louise Turner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
NANCY LOUISE TURNER**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NORTH CAROLINA)

: SS.:

COUNTY OF MECKLENBURG)

NANCY LOUISE TURNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 700 Anna Jordan Drive, Charlotte, North Carolina 28213.

2. I am currently 74 years old, having been born on October 4, 1947.

3. I am the sister of Vikki Allyn Turner-Cox, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister died from breast cancer on March 28, 2014, at the age of 49. It was medically determined that her illness was causally connected to her exposure to toxins resulting from the September 11, 2001, terrorist attacks.

5. Vikki and I didn't grow up together as children because our father got re-married. My mother was his first wife, and Vikki's mom was our father's second wife. Us kids considered each other siblings. We were all raised in New Jersey, but I was about 17-years older than Vikki. In fact, Vikki and my oldest son were both born in 1964. They graduated from the same high school in Englewood, New Jersey. I actually had a close relationship to Vikki's mom, Gwen. I

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1969
moved to North Carolina when I got married in 1987. Vikki and I started becoming closer after I moved to North Carolina. Our families would visit each other. Vikki and her husband would visit with their two youngest kids. We were close to the kids and Andre, Vikki's husband.

6. I knew that Vikki worked at Verizon on September 11, 2001. I had been to her office once prior to the attacks.

7. I found out Vikki was diagnosed with breast cancer in 2012. I found out from her mother. Once I knew, I talked to Vikki directly, and we'd speak on the phone. Vikki never wanted to focus on her cancer. She wasn't going to let it get in the way of her living her life. She didn't dwell on it in our phone calls. My family was also going through some issues at the same time as her diagnosis. My son had a drug problem, I suffered two heart-attacks. When Vikki and I spoke, we would both be checking in on each other. We both tried to keep the conversations light. I would talk to her mom, who would tell me what was going on with Vikki and how bad the cancer had become. Vikki focused on sticking to her normal routine. We had less and less communication as the cancer progressed. However, I regularly spoke with her mother, Gwen, for updates. My sister died so young. I miss her terribly.

Nancy Louise Turner
NANCY LOUISE TURNER

Sworn to before me this
12th day of July, 2022

C. P. Moore
Notary Public



Suzzanne Anderson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

SUZZANNE ANDERSON, et al.,

AFFIDAVIT OF
SUZZANNE ANDERSON

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF WESTCHESTER)

SUZZANNE ANDERSON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 96 Molly Pitcher Lane, Yorktown Heights, New York 10598.

2. I am currently 68 years old, having been born on April 14, 1954.

3. I am the sister of Stephen Vaughan, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On February 23, 2016, Stephen died from tongue cancer that had metastasized to his lungs, brain and liver. He was 58 years old. It was determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I had a great relationship with my brother. As kids, we grew up on City Island, and as adults lived near one another. Even after we both got married and had families of our own, we remained extremely close. My husband and I ended up buying our childhood home, and Stephen and his family would spend most holidays at my house. As a family, we loved to

barbecue and go out on Stephen's boat off City Island. The boat was called "Rockie," after my father's nickname. When I think of my brother, I always remember his kindness, generosity, and warmth. My husband and I went out on Stephen's boat pretty often, and he would invite us to the Morris Yacht and Beach Club for a nice dinner. We always had a lovely time.

6. On July 5, 2012, Stephen and his wife Helen came over and told us that they had been to the dentist and were advised that Stephen needed more testing. The dentist saw something in Stephen's throat that he believed may be cancerous. I was in complete shock. I begged Stephen to be strong, maintain a positive attitude, and to please recover because we had both lost a brother the year before. Shortly after we received the news about Stephen, my husband and I went on a planned vacation to Cape May, but all I could do was think of my poor brother.

7. The day Stephen had his tracheotomy done, I went to the hospital with his wife. Stephen weighed about 300 pounds at that time, and the anesthesiologist had some reservations about the procedure. The doctor sat us down and informed us of the risks involved in doing the surgery. It completely petrified me. I was so afraid we would lose him. Thankfully, Stephen came through the procedure with no difficulty. When I went to visit him afterward, I was so shaken and upset. Stephen just kept trying to reassure me that he was fine, and I didn't need to worry about him. That's just the type of guy Stephen was.

8. As Stephen's cancer progressed, he needed more radiation and other intensive treatment. A hospital bed was set up in his living room after he returned from surgery. Whenever I would visit him, it greatly pained me to see Stephen lying in a hospital bed in his living room surrounded by all kinds of medical equipment supporting his condition. There was a suction device to service Stephen's trach and all other kinds of gadgets, including a protective helmet he needed to wear during radiation. Following his chemo and radiation, Stephen participated in a clinical trial. For a while, things seemed to be going well. Stephen hung on for another three and a half years. During the clinical trial, Stephen was able to somewhat enjoy his life. He was able to tinker around and work on his boat, but the time went way too quickly.

9. I was working full time for Chase Bank when Stephen was sick. I had to pass his house on my way home from work, so I tried to stop in to see him as often as possible. Often, when I would visit, my brother was just returning from a treatment and would be watching TV to

relax. Since my husband worked nights and was home during the day, he would take Stephen to Memorial Sloan Kettering for his treatments. I would often accompany my sister-in-law to check on him whenever possible.

10. In mid-February 2016, my husband drove Stephen to the hospital for a visit. What was supposed to be a routine checkup evolved into something more complex and Stephen was admitted. He stayed in the hospital for about ten days. On the day that he passed away, my husband was with Helen at the hospital. He called me that evening and told me to hurry over as soon as possible. My brother Johnny and I went to the hospital together. We wanted Stephen to be surrounded by family to know and feel how much he was loved. In the end, Helen, Johnny, my husband and I stayed with Stephen until he passed away. I broke down and cried in my husband's arms. I was completely devastated.

11. Experiencing my brother's suffering had a profound impact on me. Our mother died of cancer, so when Stephen was diagnosed, we kind of knew what to expect, but no one is ever really prepared. We've always been a strong family; although, after I heard about Stephen's cancer I immediately worried for his family, especially his son Nick. Nick was an only child and was very close to his father. It broke my heart that Nick was going to lose him. My nephew went down an ugly path due to his father's illness and ultimate passing. I wanted so much to help him but didn't know what to do for him. We all just tried to be there. I often think about how my brother's death fractured things. I try to keep the family together but sometimes it's difficult. I really went through emotional turmoil due to Stephen's illness and death.

12. Stephen was the most decent human being I've ever known in my whole life. He was truly selfless. After 9/11, Stephen would look in the newspaper to find the obituaries of firefighters. He was always worried that there wouldn't be enough people at their funerals because so many had died and were being buried around the same time. He went to ten different funerals because he felt so sympathetic toward their families. I will miss Stephen all the days of my life. I'm reminded of him every day through pictures in my home. When I see Stephen's waving hand in the photos, I know he's looking down on us from heaven. As a tribute to my dear brother, I had a memorial bench made up with a plaque that reads "In Loving Memory of Stephen J. Vaughan," which is now displayed in Helen's backyard. Stephen was a wonderful

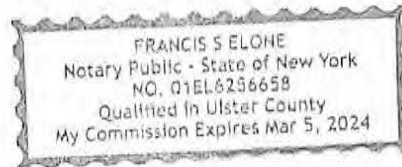
human being, and his family misses his warmth and kindness every day.

Suzanne Anderson 4/22/22
SUZANNE ANDERSON

Sworn to before me this
22nd day of April, 2022

Francis S. Elone

Notary Public



Helen Vaughan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
HELEN VAUGHAN**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF BRONX)

HELEN VAUGHAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 689 King Avenue, Bronx, New York 10464.

2. I am currently 63 years old, having been born on October 9, 1958.

3. I am the wife of Stephen Vaughan, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On February 23, 2016, my husband died from tongue cancer that had metastasized to his lungs, brain and liver. He was only 58 years old at the time of his death. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Stephen and I knew each other since we were kids. Our parents were friends, and we lived a few blocks from each other. We started dating when I was 17 years old, and we got married when I was 25. Just a few years later, our son Nick was born. Stephen was my soulmate. We loved each other very much and had a great marriage. We did everything together, including

building a home. We loved spending time with friends and going out on the Long Island Sound in Stephen's boat. Stephen was so vital to my life. We always made sure we had dinner together every night. Being a carpenter, Stephen could take care of anything that was needed around the house, including essentially rebuilding our home before we moved into it. He took such great care of me and our son, Nick. We were the envy of many of our friends. We truly had the perfect marriage.

6. Stephen worked for the New York City Department of Environmental Protection (DEP) as a carpenter. He witnessed one of the towers go down from his worksite in Queens. After September 11, 2001, he built ramps for the trailers used by the DEP. He also built ramps for the hazmat mobile labs, so that trucks, or quads, could measure the chemicals and the air quality in what they called the frozen zone. The frozen zone was near the pit of Ground Zero. Stephen's working conditions were dirty and dusty. When he would return home from work, his clothes and boots were filthy. His work at Ground Zero started almost immediately after 9/11, and the excruciatingly painful job continued for months and months. Stephen often came home depressed, describing the horrible stench of dead bodies he had encountered.

7. My husband's serious medical condition began as a sore throat and feelings of fatigue. Upon visiting with the doctor, Stephen was prescribed antibiotics for 10 days. However, his condition didn't improve. We then went to see an Ear, Nose, and Throat doctor, who ran additional tests, including a nasal endoscopy and an upper endoscopy. They discovered a very large tumor and prescribed an MRI immediately. From there, we went to Memorial Sloan Kettering, where they performed a biopsy. Stephen was diagnosed with Stage IV cancer that started in the base of his tongue. The doctor told us that the opening of his throat was smaller than a dime and that he would have died within two weeks if he hadn't gone to the doctor. That was so frightening for me to hear. Even more shocking was that we were told that Stephen would require a tracheostomy tube to assist him with breathing and that he probably had less than a year to live if he survived the procedure. I was paralyzed with fear. I couldn't believe this was happening to him. He didn't deserve this.

8. Stephen battled his cancer for four years. The trach tube was really hard on Stephen, and me as well. It was physically uncomfortable for him and made the area around his neck smell putrid. It was also difficult to take care of because it had to be suctioned out and

cleaned on a regular basis.

9. When Stephen was diagnosed with Stage IV cancer, I was totally shocked. I was in denial in the beginning because he never complained much. During Stephen's battle, I tried to remain as strong as possible for the family's benefit. However, in reality, I used to cry when I was in the shower or driving in the car by myself. I had a large group of girlfriends that tried to support me during this time, but the pressure was just too much, and I became depressed. I stopped eating and had a difficult time sleeping. I had to go on antidepressants. I was a mess.

10. Stephen had been admitted to Sloan Kettering before he died. He was very tired and weak. I truly wish he had been given more time. On the morning he died, his nurse told me that he probably wouldn't make it through the day. Apparently, his breathing was very shallow, and he had stopped urinating. I fell apart. Stephen was an organ donor, and while he was in the hospital, I received a call from the eye bank asking if I would allow Stephen's corneas to be donated. Because of his cancer, his eyes were the only body part that could be donated. I agreed to the donation because I knew that's what Stephen would have wanted.

11. The impact of Stephen's illness extended to our entire family. My son, Nick, is a recovering alcoholic and drug addict. Nick's use escalated when his dad was suffering with cancer. Since Nick lived with us while I was trying to care for Stephen, I had the added pressure of dealing with Nick's addiction problems. Sometimes, it was more than I could take. I couldn't bear the thought of losing my husband and my son at the same time. Nick was in and out of rehab and also had overdosed a few times. After Stephen died, Nick was in the hospital on life support. Thank God he survived and has been sober for two years now.

12. Stephen was my rock. He was my life. We were together 40 years before he died at the age of 58. I'm a breast cancer survivor myself, and Stephen helped me through my dark times. I was totally shocked when he was diagnosed. I brought him to every chemo and radiation treatment and attended every doctor's appointment with him. I coordinated all of his visits with oncologists, surgeons, nutritionists, speech pathologists, and nurses. I ordered all of his medical supplies and equipment that he needed to stay alive. I did all of this while being the sole caregiver of my parents. Stephen was also on immune therapy trials at the time, which created its own emotional strain on me. The doctors tried to build up his immune system to fight off the cancer, and the trials gave him a little bit more time to live. The problem was that you have to be

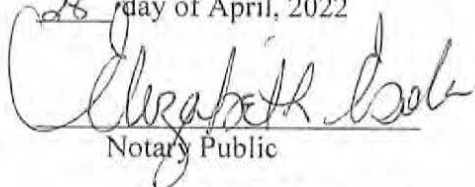
healthy enough to qualify for the trials, which created a constant worry that Stephen would become too sick and would be rejected. Eventually, the trials stopped working, which meant more chemo.

13. Financially, managing a loved one's cancer care is very expensive. Driving to doctor's appointments, wear and tear on my car, parking, gas, taking buses, subways, and many taxis, not to mention medical bills and copayments. Stephen earned a good living. However, due to his illness, he had to immediately stop working and retire early. When he was healthy, he used to work a lot of overtime, which helped pull us through. When he retired early, I lost the income that he would have earned from his pension and social security had he been able to work longer. Stephen's passing away created other expenses as well. He was no longer around to maintain and repair our home. I had to hire contractors for various things, which was quite expensive.

14. My whole life has been shattered since my husband died. I still battle depression and chronic anxiety. I always thought that we would grow old together and someday be grandparents together. I never thought I would be widowed in my 50's. My parents are still alive, and they're in their 80's. Stephen was supposed to be here with me to help take care of them. After 9/11, Stephen was only doing his job. He should never have been punished for that and suffer the way he did.


HELEN VAUGHAN

Sworn to before me this
28 day of April, 2022


Notary Public

ELIZABETH ESOLA
NOTARY PUBLIC-STATE OF NEW YORK
No. 01ES049826
Qualified in Bronx County
My Commission Expires 09-25-2025

John Vaughan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
JOHN VAUGHAN**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF BRONX)

JOHN N. VAUGHAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3285 Radio Drive, Bronx, New York 10465.

2. I am currently 70 years old, having been born on April 10, 1952.

3. I am the brother of Stephen Vaughan, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On February 23, 2016, my brother died from tongue cancer at the age of 58. The cancer had metastasized to his lungs, brain and liver. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Stephen was my kid brother, but he and I were buddies. We did a lot of things together. We were particularly fond of boating since we lived near City Island. Stephen had a nice boat we called "Rockie," which was our father's nickname. Stephen had joined the Morris Yacht and Beach Club at the end of City Island so he could have a place to relax and spend more

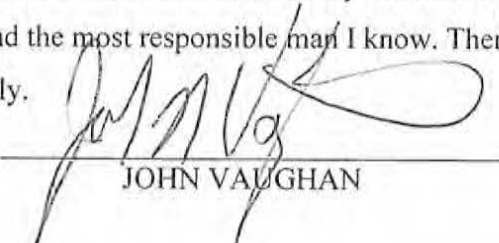
time with the family. He was five years my junior, and as the older brother, I always tried to protect him. Even with our age difference, I always felt a deep connection to him.

6. Stephen worked as a carpenter with the New York City Department of Environmental Protection (DEP). After 9/11, he built ramps for trailers used by the DEP so that equipment could be transported on site to measure air quality and hazardous pollutants. The work of the DEP was very critical since they were responsible for taking samples and learning more about the toxic dust at the World Trade Center site. My brother's work in facilitating transportation for all those trailers was no easy task.

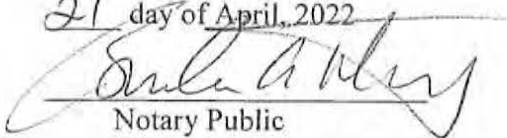
7. It took some time before I knew Stephen had cancer. My brother was a humble soul, much like our father. We didn't know at first because he didn't want to upset the family so much. When I finally did find out about his cancer, my heart sank. The doctors estimated that my brother only had another year to live. He never spoke too much about it because he was trying to be protective. My younger brother was protecting me. That was my job. It broke my heart to know that he was so sick.

8. Stephen's illness brought us closer together. We spent more time together and had a chance to get to know each other even better. Stephen had many friends who were very comforting to him, and I had the chance to meet many of them as they came to visit him. It afforded me an opportunity to learn more about his life and the impact he had on the people around him. Before Stephen passed, he gave "Rockie" to me. That meant more than gold to me because I knew it was such a tremendous source of pride for him.

9. My brother was a kind and generous person. He had a great sense of humor. He was someone you would want to watch your back. He was a loving husband, devoted father, and a good brother to me. He believed in God, and he lived a clean and healthy life before getting sick. Stephen was a hard-working provider and the most responsible man I know. There is such a void in my life without him. I miss him terribly.


JOHN VAUGHAN

Sworn to before me this
21 day of April, 2022


Notary Public

BARBARA A. WATSON
NOTARY PUBLIC, State of New York
No. 01WA6086354
Qualified in Bronx County/
Commission Expires 01/21/2023